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**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA**

**SAN FRANCISCO DIVISION**

IN RE CATHODE RAY TUBE (CRT)  
ANTITRUST LITIGATION,

No. 07-cv-5944-SC  
MDL No. 1917

This Document Relates to:

*Electrograph Systems, Inc. et al. v.  
Technicolor SA, et al., No. 13-cv-05724;*

*Alfred H. Siegel, as Trustee of the Circuit  
City Stores, Inc. Liquidating Trust v.  
Technicolor SA, et al., No. 13-cv-05261;*

*Best Buy Co., Inc., et al. v. Technicolor SA,  
et al., No. 13-cv-05264;*

*Interbond Corporation of America v.  
Technicolor SA, et al., No. 13-cv-05727;*

*Office Depot, Inc. v. Technicolor SA, et al.,  
No. 13-cv-05726;*

*Costco Wholesale Corporation v.  
Technicolor SA, et al., No. 13-cv-05723;*

**DECLARATION OF STEPHEN M.  
JUDGE IN SUPPORT OF THE  
THOMSON DEFENDANTS'  
ADMINISTRATIVE MOTION TO SEAL  
AND OPPOSITION TO DIRECT  
ACTION PLAINTIFFS'  
ADMINISTRATIVE MOTION TO  
EXTEND THE DISCOVERY DEADLINE  
AGAINST THE THOMSON  
DEFENDANTS**

Judge: Hon. Samuel Conti

DECLARATION OF STEPHEN M. JUDGE IN  
SUPPORT OF THOMSON DEFENDANTS'  
OPPOSITION AND MOTION TO SEAL

No. 07-5944-SC; MDL No. 1917

1 *P.C. Richard & Son Long Island*  
 2 *Corporation, et al. v. Technicolor SA, et al.,*  
 3 *No. 31:cv-05725;*

4 *Schultze Agency Services, LLC, o/b/o*  
 5 *Tweeter Opco, LLC, et al. v. Technicolor SA,*  
*Ltd., et al., No. 13-cv-05668;*

6 *Sears, Roebuck and Co. and Kmart Corp. v.*  
 7 *Technicolor SA, No. 3:13-cv-05262;*

8 *Target Corp. v. Technicolor SA, et al., No.*  
 9 *13-cv-05686*

10 *Tech Data Corp., et al. v. Hitachi, Ltd., et*  
*al., No. 13-cv-00157*

11 *Dell Inc. v. Hitachi Ltd.,*  
 12 *No. 13-cv-02171;*

13 *Sharp Electronics Corp., et al. v. Hitachi,*  
*Ltd., et. al., No. 13-cv-01173*

14 *ViewSonic Corporation v. Chunghwa Corp.,*  
 15 *et al., No. 14-cv-02510*

16  
 17 I, Stephen M. Judge, hereby declare as follows:

18 1. I am currently an attorney with the law firm Faegre Baker Daniels LLP, counsel  
 19 for Defendants, Technicolor SA (f/k/a Thomson SA) and Technicolor USA, Inc. (f/k/a Thomson  
 20 Consumer Electronics, Inc.) (together “Thomson Defendants”). I am admitted to practice *pro hac*  
 21 *vice* before the United States District Court for the Northern District of California. I make this  
 22 declaration in support of the Thomson Defendants’ Administrative Motion to Seal and Opposition  
 23 to Direct Action Plaintiffs’ Administrative Motion to Extend the Discovery Deadline Against the  
 24 Thomson Defendants. The statements contained in this declaration are based on my personal  
 25 knowledge and, if called as a witness, I could competently testify to the following facts.

26 2. Attached hereto as Exhibit A, and filed under seal, is a true and correct copy of  
 27 Samsung SDI Defendants’ Supplemental Responses to Direct Purchaser Plaintiffs’ First Set of  
 28 Interrogatories, Nos. 4 and 5, dated October 17, 2011, which the Samsung SDI Defendants have

designated as “Confidential” under the terms of the Stipulated Protective Order entered in this case (No. 07-cv-05944, Dkt. No. 306, amended at Dkt. No. 1142).

3. Attached hereto as Exhibit B is a true and correct copy of Plaintiff Sharp Electronics Corporation and Sharp Electronics Manufacturing Company of America, Inc.’s (together “Sharp”) Objections and Responses to Defendants Thomson SA and Thomson Consumer Electronics, Inc.’s First Set of Interrogatories, dated July 10, 2014.

4. Attached hereto as Exhibit C is a true and correct copy of the April 11, 2014 letter from counsel for Sharp to Kathy Osborn.

5. Attached hereto as Exhibit D is a true and correct copy of Direct Action Plaintiffs’ and Direct Purchaser Plaintiffs’ Deposition Notice of Didier Trutt Pursuant to Fed. R. Civ. P. 30, dated August 8, 2014.

6. Attached hereto as Exhibit E is a true and correct copy of the April 18, 2014 e-mail from Kathy Osborn to counsel for Sharp and liaison counsel for DAPs.

7. Attached hereto as Exhibit F is a true and correct copy of Thomson SA’s Responses to Direct Action Plaintiffs’ First Set of Requests for Production of Documents, dated May 14, 2014.

8. Attached hereto as Exhibit G is a true and correct copy of the June 11, 2014 letter from counsel for Sharp to Kathy Osborn, summarizing the June 4, 2014 meet and confer.

9. On June 18, 2008, the Court approved a “Stipulated Protective Order” in this matter (Dkt. No. 306) (the “Protective Order”).

10. Pursuant to the Protective Order and Civil Local Rules 79-5(d) and 7-11, the Thomson Defendants seek to seal the following concurrently filed materials: (a) the highlighted portions of the Thomson Defendants’ Opposition; and (b) Exhibit A to the concurrently filed Declaration of Stephen M. Judge in Support of the Thomson Defendants’ Opposition.

11. The highlighted portions of the Thomson Defendants’ Response discuss or reference: (a) Exhibit A; (b) allegations contained in paragraph 196 of Sharp Electronics Corporation and Sharp Electronics Manufacturing Company of America, Inc.’s (together “Sharp”) First Amended Complaint that have been sealed because they allegedly have been

1 derived from documents previously designated as “Confidential” or “Highly Confidential” by  
2 other parties in this action, *see* Order Regarding Administrative Motion to Seal Portions of  
3 Plaintiffs’ First Amended Complaint [Dkt. No. 2211]; or (c) the contents of documents referenced  
4 in Sharp’s Objections and Responses to Defendants Thomson SA and Thomson Consumer  
5 Electronics, Inc.’s First Set of Interrogatories, attached as Exhibit B to the Declaration in Support  
6 of the Thomson Defendants’ Opposition, which documents have been designated as  
7 “Confidential” or “Highly Confidential” by the Samsung SDI Defendants, the Philips Defendants,  
8 the Hitachi Defendants, the Panasonic Defendants, or the Toshiba Defendants. The Thomson  
9 Defendants seek to submit these documents under seal in good faith in order to comply with the  
10 Stipulated Protective Order and this Court’s Local Rules.

11 I declare under penalty of perjury, under the laws of the United States of America, that the  
12 foregoing is true and correct. Executed this 2nd day of September 2014, at South Bend, Indiana.

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14 /s/ Stephen M. Judge  
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